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10 **UNITED STATES DISTRICT COURT**
11 **EASTERN DISTRICT OF CALIFORNIA**
12 **SACRAMENTO DIVISION**

13
14 BARBARA L. BONKOFSKY, } Case No.: 2:23-cv-02690-AC
15 Plaintiff, } STIPULATION AND [PROPOSED] ORDER
16 vs. } FOR AN EXTENSION OF TIME
17 COMMISSIONER OF SOCIAL SECURITY,)
18 Defendant. }
19

20
21 Pending the Court's approval, the parties hereby stipulate that the time for Defendant to
22 respond to Plaintiff's Motion for Summary Judgment be extended twenty-eight (28) days from
23 April 1, 2024, up to and including April 29, 2024.

24 This is Defendant's first request for an extension, and it is made with good cause. This is
25 Defendant's first request for an extension, and it is made with good cause. This case was
26 recently reassigned to undersigned counsel for Defendant, along with two other briefs, all of
27 which are due in the first week of April 2024. Moreover, counsel now has five briefs due in
28 the first half of April, in addition to other litigation deadlines that month. Thus, Defendant

1 requires an extension in this case, and may require extensions in other cases, and requests this
2 extension in good faith and with no intent to delay these proceedings unnecessarily.

3 The parties further stipulate that the Court's Scheduling Order shall be modified
4 accordingly.

5 Respectfully submitted,

6 Dated: March 8, 2024

*/s/ John David Metsker**
(*as authorized via e-mail on March 8, 2024)
JOHN DAVID METSKER
Attorney for Plaintiff

9 Dated: March 8, 2024

PHILLIP A. TALBERT
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14 By: */s/ Mary Tsai*
MARY TSAI
15 Special Assistant U.S. Attorney
16 Office of Program Litigation, Office 7

17 Attorneys for Defendant

18 **ORDER**

19 Pursuant to the parties' stipulation, IT IS SO ORDERED that Defendant shall have an
20 extension, up to and including April 29, 2024, to respond to Plaintiff's Motion for Summary
21 Judgment.

22 DATED: March 11, 2024

Allison Claire
23 ALLISON CLAIRE
24 UNITED STATES MAGISTRATE JUDGE